

Exhibit B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

MDL No. 3076
CASE NO. 1:23-md-03076-KMM

In Re: FTX Cryptocurrency Exchange Collapse Litigation

NOTICE OF TAKING THE VIDEOTAPED DEPOSITION OF
DEFENDANT DELTEC BANK AND TRUST COMPANY LIMITED'S RULE 30(b)(6)
REPRESENTATIVE(S)

Pursuant to Federal Rule of Civil Procedure 30, Plaintiff's counsel will take the deposition of the below-named person/entity on the date, time, and at the location indicated, or at such other time as may be agreed by the parties.

DEPONENT: Defendant Deltec Bank and Trust Company, ("Deltec Bank"), by and through Deltec Bank's corporate representative(s) with knowledge of the eight topics listed in **Exhibit A**, pursuant to Federal Rule of Civil Procedure 30(b)(6).

DATE: January 11, 2024

TIME: 10:00 am EST

LOCATION: Zoom (contact counsel for details)

The aforesaid deposition will be before a court reporter, an officer authorized by law to administer oaths and take depositions in the State of Florida. The deposition is being taken for the purpose of discovery, for use at trial, or both, or for such other purposes as are permitted under the Federal and Local Rules of Civil Procedure.

Respectfully submitted on December 22, 2023.

<u>Plaintiffs' Co-Lead Counsel</u>	
<u>By: /s/ Adam Moskowitz</u> Adam M. Moskowitz Florida Bar No. 984280 Joseph M. Kaye Florida Bar No. 117520	<u>By: /s/ David Boies</u> David Boies Alex Boies Brooke Alexander

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 22, 2023, a true and correct copy of the foregoing was served via email to all counsel of record.

By: /s/ Adam M. Moskowitz
Adam M. Moskowitz

EXHIBIT A

I. DEFINITIONS AND INSTRUCTIONS

Unless otherwise specified, the terms set forth below have the following meanings:

1. “Deltec” “You,” or “Your” means Defendant Deltec Bank, its predecessors, successors, subsidiaries, departments divisions, and/or affiliates, including, but not limited to, Deltec International Group, Deltec Asset Management Group, Delchain Ltd., Relm Insurance, Halcyon Life, Fulgur Alpha, Deltec Fund Services Limited, and/or any entities affiliated with or held by Deltec Bank or in which Deltec Bank is a member or other owner, its international, national or local branches or offices. “You” or “Your” shall also encompass Deltec’s current and prior partners, officers, directors, employees, representatives, agents or any persons acting or purporting to act on behalf of Deltec, including but not limited to Jean Chalopin.

2. “Co-Defendants” means any of the other Defendants sued in this Action, and any of their affiliates, subsidiaries, divisions, segments, predecessors, successors, officers, directors, employees, representatives, or agents.

3. “FTX Entities” means West Realm Shires Services, Inc., FTX Trading Ltd, Blockfolio, Inc., Alameda Research, LLC, and any of their affiliates, subsidiaries, divisions, segments, predecessors, successors, officers, directors, employees, representatives, or agents.

4. “FTX Platform” refers to the FTX Entities’ mobile application and/or web-based cryptocurrency investment service that places cryptocurrency trade orders on behalf of users.

5. “YBAs” refers to the Yield-Bearing Accounts offered by the FTX Entities on the FTX Platform.

6. “FTT” refers to the native cryptocurrency exchange token of the FTX Platform ecosystem.

7. “Document(s)” means any written, printed, typed or other graphic matter, of any kind or nature, whether in hard copy or electronic format, whether the original, draft, or a copy and copies bearing notations or marks not found on the original, including but not limited to memoranda, reports, recommendations, notes, letters, envelopes, post-its, emails, telegrams, messages, manuscripts, studies, analyses, tests, comparisons, books, articles, pamphlets, magazines, newspapers, booklets, circulars, bulletins, notices, instructions, minutes, agreements, contracts, and all other written communications, of any type, including inter and intra-office communications, purchase orders, invoices, bills, receipts, questionnaires, surveys, charts, graphs, videos, photographs, sketches, drawings, house sheets, tapes, voice messages or other recordings, print-outs or compilations from which information can be obtained or, if necessary, translated through detection devices into reasonably usable form, including all underlying or preparatory materials and drafts thereof.

8. “Person” or “People” means any natural person(s) or any business, legal, or governmental entity (or entities) or association(s).

9. All/Each – The terms “all” and “each” shall be construed as meaning either all or each as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside its scope.

10. Objections: Where an objection is made to any request, the objection shall state with specificity all grounds. Any ground not stated in an objection within the time provided by the Federal Rules of Civil Procedure, or by the Court’s order, or any extensions thereof, shall be waived.

11. Whenever a reference to a business entity appears, the reference shall mean the business entity, its affiliated companies, partnerships, divisions, subdivisions, directors, officers, employees, agents, clients or other representatives of affiliated third parties.

12. Unless otherwise stated in a request, the time period for which you must respond is beginning in January 1, 2019 and ending at the present time.

II. DEPOSITION SUBJECTS

Pursuant to Rule 30(b)(6), Deltec Bank shall designate and produce for deposition one or more of its officers, directors, managing agents, or other persons who are knowledgeable about and consent to testify on its behalf concerning the following subject matters:

1. All Documents and responses provided in response to Plaintiffs' requests for production and interrogatories.
2. Contracts or agreements regarding any business You (personally or through any entity owned by You, or any of Your or Your entities' parents, subsidiaries, affiliates, representatives, employees, or agents) conducted with the FTX Entities , including any payments made to You (personally or through any entity owned by You, or any of Your or Your entities' parents, subsidiaries, affiliates, representatives, employees, or agents) in accordance with any such contract or agreement.
3. Your operations or business conducted (personally or through any entity owned by You, or any of Your or Your entities' parents, subsidiaries, affiliates, representatives, employees, or agents) in the United States, including, but not limited to, Florida and/or California, or with others located there.
4. All due diligence You (personally or through any entity owned by You, or any of Your or Your entities' parents, subsidiaries, affiliates, representatives, employees, or agents) conducted before You opened and serviced FTX Entities' accounts at Deltec Bank or otherwise conducted any business with FTX Entities, as well as any continuing due diligence or monitoring You conducted regarding the FTX Entities during the period in which you continued to service FTX Entities' accounts at Deltec Bank and/or continued to do business with FTX Entities.
5. All banking, lending, financing, investment, asset management, insurance and/or other services provided by You to FTX Entities and/or by FTY Entities to You.

6. All investments, funding, loans, and/or other financing provided by You to FTX Entities and/or by FTX Entities to You.

7. All conduct You had with Co-Defendants.

8. This lawsuit and/or the subject matter of this lawsuit.